EXHIBIT 22

DECLARATION OF ADRIANA GOMEZ

I, Adriana Gomez, declare as follows:

1. I am the Associate Director, Financial Management and Compliance in Sponsored Projects at University of Nevada, Reno ("UNR or University") in Reno, Nevada. I have held that position since October 2024. I served as Accounting/Financial Manager in Viterbi School of Engineering at the University of Southern California for over 12 years.

2. I have personal knowledge of the contents of this declaration, or have knowledge of the matters based on my review of information and records gathered by UNR personnel, and could testify thereto.

3. UNR receives substantial annual funding from the National Science Foundation ("NSF"). UNR's current NSF portfolio includes 177 active awards (both direct and pass-through) with a total authorized amount of $95.7 million with an effective indirect cost rate of 41%. In the last year, we have received $15.4 million in funding from NSF.

4. UNR intends to apply for new funding awards, and/or renewals and continuations of existing funding awards, in the next year and in future years to come.

5. The funding UNR receives from NSF supports critical and cutting-edge research vital to our nation's security that also often has benefits for American business' technological competitiveness, and public health. Millions of Americans benefit from and depend on this research. For example:

   a. Artificial Intelligence and Computational Modeling: UNR's NSF-supported research in artificial intelligence and computational modeling advances our ability to detect and respond to disease threats, contributing to national biosecurity. By predicting disease trajectories and designing

precision treatments, this research also aids hospitals, pharmaceutical companies, and public health agencies in managing population health more effectively.

b. Biomedical Engineering and Materials Science: Through NSF funding, UNR researchers develop high-performance biomedical coatings, responsive sensors, and wearable technologies. These innovations not only improve early disease detection and personalized treatment but also strengthen the U.S. medical device industry's ability to innovate and compete globally, securing both public health and economic vitality.

c. Biological Systems and Immune Response Studies: NSF supports foundational studies at UNR into immune responses, tissue repair, and cellular stress. These discoveries help prepare the nation for biological threats—natural or engineered—while enabling advancements in regenerative medicine, benefiting veterans, trauma patients, and aging populations alike.

d. Engineering and Medical Imaging Technologies: UNR scientists are using NSF funding to simulate and image how the body functions under stress and recovery, helping to optimize surgical procedures and rehabilitation. These tools can be adapted for military medicine, sports science, and rural healthcare delivery, making high-quality diagnostics more widely accessible.

e. Critical Minerals and Mining Innovation: NSF funding also supports research at UNR aimed at improving domestic mining and refining

technologies for rare earth elements and other critical minerals. These projects focus on developing more efficient, environmentally responsible extraction and processing methods, including recycling from mine tailings and low-impact leaching techniques. This research reduces U.S. dependence on foreign sources—especially adversarial nations—for materials essential to national defense, clean energy, and high-tech manufacturing.

6. Reimbursement of UNR's indirect costs is essential for supporting this research. NSF's proposal to cut indirect cost rates on new awards to 15% would preclude carrying out the kinds of research projects described in paragraph 5 in the future.

7. Indirect costs include constructing and maintaining state-of-the-art laboratories and specialized facilities required to meet the technical demands of advanced research such as UNR's Earthquake Engineering Laboratory, and Center for Transformative Environmental Monitoring Programs (CTEMPS). They also cover the procurement, calibration, and maintenance of critical research equipment, including high-temperature furnaces, ultrafast lasers, X-ray diffraction instruments, cryogenic systems, and precision laboratory safety infrastructure. These costs support safe and compliant research, secure IT networks, data storage environments, environmental compliance systems, and highly trained technical personnel essential for safe, efficient, and compliant research operations. Without this critical infrastructure, we simply cannot conduct the research.

8. For example, with respect to the areas of research described in Paragraph 5:

a. Artificial Intelligence and Computational Modeling: This research requires access to high-performance computing clusters, secure data storage

environments, and advanced modeling software. These systems enable researchers to run large-scale simulations of disease spread and predictive analytics essential for biosecurity and public health interventions. Maintaining cybersecurity and compliance infrastructure is critical due to the sensitivity of data involved.

b. Biomedical Engineering and Materials Science: NSF-funded projects in this area depend on precision instrumentation such as scanning electron microscopes, X-ray diffraction instruments, and materials synthesis labs. These facilities support the development of novel sensors, biocompatible coatings, and wearable devices. Indirect costs also fund clean rooms and safety systems necessary to prototype and test sensitive biomedical technologies.

c. Biological Systems and Immune Response Studies: This work requires specialized wet lab spaces outfitted with biosafety cabinets, cryogenic storage systems, and tissue culture suites. Equipment such as fluorescence microscopes and flow cytometers are essential to analyzing cellular behavior and immune functions. Maintaining these environments according to federal biosafety standards is only possible through reliable indirect cost support.

d. Engineering and Medical Imaging Technologies: Research in this category utilizes advanced imaging systems—including MRI simulators, ultrasound models, and motion capture platforms—as well as mechanical testing rigs that simulate human movement or surgical stress. Many of these tools are housed in facilities like the Earthquake Engineering Laboratory and require precision

calibration, lab technician oversight, and custom software tools, all of which are supported through indirect costs.

e. Critical Minerals and Mining Innovation: These projects rely on specialized facilities such as the Mackay Mines Building and lab complex, as well as equipment including high-pressure autoclaves, laboratory-scale reactors, and advanced analytical tools like X-ray fluorescence and electron microscopes. Indirect costs support technical staff to operate these systems, field instrumentation to monitor site conditions, and compliance systems to ensure responsible environmental stewardship. These infrastructure components are essential for maintaining U.S. leadership in clean mining and securing independent access to strategically vital minerals.

9. Physical facilities costs are one of the largest components of indirect costs. This includes not only the usual costs of constructing and maintaining buildings where research occurs, but the very high costs of outfitting and maintaining specialized laboratory space, which can require special security, advanced HVAC systems, and specialized plumbing, electrical systems and waste management, as well as specialized laboratory equipment. Additional critical features of UNR's research spaces include: vibration-isolated floors for high-precision instruments; cryogenic storage systems; electromagnetic shielding for sensitive instrumentation; clean rooms for materials and biomedical research; and radiation shielding for plasma and high-energy physics experiments. The features and amount of space available to researchers have a direct and obvious impact on the nature and amount of research that can be done at UNR. A reduction to a 15% indirect cost recovery rate, even if phased in through application to only new awards, would severely impact our laboratories and operations, with potential closures of critical facilities such

as the Earthquake Engineering Laboratory, the Nevada Terawatt Facility, or specialized labs within the Mackay Mines Complex. These closures would not only disrupt ongoing research but also result in the loss of highly trained technical staff and research personnel whose roles are sustained through indirect cost support. Reopening such facilities after closure would be extraordinarily difficult, requiring re-certification, re-staffing, recalibration of equipment, and re-approval from federal sponsors—if even feasible. The interruption to research programs, particularly those involving sensitive instrumentation or multi-year projects, could cause permanent setbacks. Without adequate indirect cost recovery, the University may be forced to reduce building operating hours, defer maintenance on critical infrastructure, and halt planned upgrades. These changes would directly reduce research capacity and diminish the University's competitiveness for future NSF and other federal funding.

10. In addition, indirect costs fund the administration of awards, including staff who ensure compliance with a vast number of regulatory mandates from agencies such as NSF. These mandates serve many important functions, including: ensuring research integrity; protecting research subjects; properly managing and disposing of chemical and biological agents and other materials used in research; managing specialized procurement and security requirements for sensitive research; managing funds; preventing technologies and other sensitive national security information from being inappropriately accessed by foreign adversaries; providing the high level of cybersecurity, data storage, and computing environments mandated for regulated data; ensuring compliance with specialized security protocols and safety standards; maintaining facility accreditation and equipment calibration to meet research quality and security standards; and preventing financial conflicts of interest. They also support: training and onboarding for research personnel in federal compliance standards; oversee export control regulations; coordinate with

Institutional Review Boards ("IRBs") and Institutional Animal Care and Use Committees ("IACUCs"); manage data use agreements and intellectual property disclosures; and ensure timely and accurate reporting to federal sponsors, including financial, technical, and effort reporting. These functions are essential to avoid audit findings, maintain eligibility for future federal funding, and uphold the institution's reputation for responsible and ethical research.

11. Recovery of UNR's indirect costs is based on predetermined rates that have been contractually negotiated with the federal government.

12. Through fiscal year 2025, the predetermined indirect cost rates are 47% for the University of Nevada, Reno for on-campus research sponsored by the National Science Foundation.

13. The effects of a reduction in the indirect cost rate to 15% for new awards would be devastating. In fiscal year 2025, UNR expects to receive $9 million in NSF funding for direct costs and $3.7 million in NSF funding for indirect costs. Over the next five years, UNR anticipates receiving an average of $15.6 million from the NSF for annual direct costs and approximately $6.4 million in indirect cost recovery on an annual basis.

14. If—contrary to what UNR has negotiated with the federal government—the indirect cost rate was reduced to 15% for new awards, that would quickly reduce UNR's anticipated annual indirect cost recovery by $4.4 million, to $2 million.

15. This reduction would have deeply damaging effects on UNR's ability to conduct research from day one. Many of UNR's current research projects will be forced to slow down or cease abruptly if we are forced to apply for renewals at the 15% indirect cost cap rather than our predetermined indirect cost rate of 47%. And even though the reduction in the indirect cost rate only applies to new NSF awards, it immediately negates UNR's budgetary assumptions, and will

quickly strain UNR's budget as work under existing awards concludes and is not replaced by new awards or renewals at our predetermined indirect cost rate of 47%. This will necessarily and immediately result in staffing reductions across the board. For example:

a. The University would be required to lay off an estimated 20–30 grant support and technical personnel within a matter of weeks. This would include key Sponsored Projects staff, grant accountants, lab technicians, and compliance officers whose roles are funded by indirect cost recovery. Their departure would significantly hamper UNR's ability to manage active research awards, ensure federal compliance, and support timely reporting and audits—functions that are essential to the continuation of federally sponsored research. Moreover, recruiting staff with the requisite technical expertise, institutional knowledge, and federal regulatory experience, especially those familiar with NSF and export control requirements, is exceedingly difficult. Even if funding were later restored, it would be a major challenge to rehire and retrain personnel to resume paused projects. Top scientists and students are unlikely to relocate to or remain at an institution that cannot guarantee the infrastructure and staffing needed for sustained research productivity.

b. Technical staff supporting high-cost core facilities such as the CTEMPS, the Earthquake Engineering Laboratory, and biomedical wet labs would face immediate risk of furlough or termination. Without trained personnel to maintain specialized equipment, ensure lab safety, and support researchers, these facilities could not remain operational. Projects requiring 24/7 monitoring

of biological samples, hazardous materials compliance, or cryogenic system management would be suspended, and in many cases, irreversibly disrupted.

16. Beyond staffing cuts, a 15% indirect cost cap would immediately destabilize UNR's research planning and facility operations. The University would be forced to halt scheduled maintenance on critical research infrastructure, delay upgrades to data security systems, and pause planned renovations of outdated laboratories that are necessary to remain compliant with federal safety and cybersecurity standards. This would undermine ongoing NSF-funded work in AI, materials science, and medical technologies, fields in which data protection, equipment calibration, and environmental control systems are non-negotiable for project integrity. Additionally, student training programs and graduate fellowships supported through grant overhead would shrink or disappear, narrowing UNR's research pipeline and reducing opportunities for underrepresented groups in STEM. These harms would be felt across all departments engaged in federally funded work, leading to long-term erosion of the University's competitiveness and mission.

17. UNR has, for decades, relied on the payment of indirect costs. And until now, we have been able to rely on the well-established process for negotiating indirect cost rates with the government to inform our budgeting and planning. Operating budgets rely on an estimate of both direct and indirect sponsored funding to plan for annual staffing needs (*e.g.*, post-docs, PhD students, and other research staff), infrastructure support (*e.g.*, IT networks, regulatory compliance, and grant management support), and facility and equipment purchases. And in some cases, UNR has long-term obligations—for example, multi-year support packages for admitted PhD students, partial salary coverage for tenured and tenure-track faculty engaged in research, faculty startup commitments, and maintenance contracts for critical lab infrastructure—and it relies on budgeted grant funding, including associated indirect cost recovery, to fulfill these

commitments. This multi-year budgeting process also assumes the availability or possibility of grant renewals at roughly similar terms – and certainly at the negotiated indirect cost rate – as had been previously available.

18. In addition to the immediate effects and reliance interests described above, dramatically cutting indirect cost reimbursement would have longer-term effects that are both cumulative and cascading. Over time, the loss of staff responsible for laboratory safety monitoring, hazardous materials management, and cybersecurity enforcement would increase the risk of regulatory violations, safety incidents, and research interruptions. Complex NSF projects involving sensitive data, high-precision equipment, or long-term scientific protocols cannot simply be paused and restarted; many would require costly re-certification, re-training of personnel, and federal re-approvals. In some cases, valuable research samples or data would be lost permanently. The erosion of institutional capacity would deter future faculty recruitment, reduce student opportunities, and damage the University's national research reputation—creating setbacks that would persist even if funding were later restored.

19. Disruptions to UNR's research will also have negative effects in the Reno area, the state of Nevada, and the broader region. Nearly 11,000 of Nevada's residents were directly employed by UNR—and it collaborates with state and local partners to help solve regional challenges through joint research and innovation. UNR's research also fuels spending in the regional economy, including by driving discoveries that launch new ventures, attract private investment, and make a positive social impact. A massive reduction in UNR's research budget would immediately and seriously jeopardize these contributions to the local region.

20. Finally, slowdowns or halts in research by UNR and other American universities will allow competitor nations that are maintaining their investments in research to surpass the

United States on this front, threatening both our Nation's national security and its economic dominance. UNR's NSF-funded research plays a critical role in advancing artificial intelligence, cybersecurity, advanced biomedical technologies, clean energy innovation, and domestic mineral extraction—fields essential not only for technological leadership but also for achieving energy and resource independence. These projects support the development of resilient energy systems, rare earth element supply chains, and low-impact mining and manufacturing processes. Weakening this research would increase reliance on foreign adversaries for critical technologies and materials, undermining U.S. strategic autonomy at a time when global competition for innovation, energy security, and economic influence is intensifying.

21. UNR cannot cover the funding gap itself. UNR's financial model, like most public research universities, is built on a combination of tuition, state support, and externally sponsored research funding—including full recovery of indirect costs. These elements are interdependent, and significant shortfalls in one area cannot be absorbed without causing substantial disruptions to the others.. While UNR maintains an endowment, it is neither feasible nor sustainable for UNR to use endowment funds or other revenue sources to offset shortfalls in indirect cost recovery:

a. The majority of UNR's endowment—around 98%—is restricted to specific donor-designated purposes, such as scholarships, faculty chairs, and academic programs. UNR is not legally permitted to use those funds to cover research infrastructure costs.

b. Even the portion of the endowment that is unrestricted is subject to a carefully managed annual payout, typically around 4.5%, to ensure long-term financial stability for the institution.

22. It is also not feasible or sustainable for UNR to use other revenue sources to offset shortfalls in indirect cost recovery. As a non-profit institution, UNR reinvests nearly all of its revenue into mission-critical activities, leaving little margin to absorb unexpected funding gaps. In other words, unlike for-profit organizations, UNR does not generate significant surpluses that could be redirected without impacting core academic priorities such as educational programs and financial aid support for students. Absorbing the cost of a lower indirect cost rate, even if it were possible, would create long-term budget pressures on UNR—which would in turn force reductions in key investments supporting UNR's faculty, students, staff, research, and teaching infrastructure, as well as other critical activities needed to maintain UNR's academic excellence. So even if UNRcould "cover" some of the indirect costs previously funded by NSF, it could do so only by negatively affecting other critical goals central to the institution's mission.

23. If UNR can no longer apply for NSF grants because it is unable to accept the new indirect cost rate cap – a risk that would impact 100% of our NSF grants – the harms described herein would be exacerbated. That greater loss in funding from NSF would mean more significant cost-cutting measures would need to be adopted—and quickly. UNR cannot "float" all of the indirect costs it would likely lose coverage for – nor could it float NSF grants altogether if it is not able to accept the 15% cap – so some research projects would need to be terminated altogether, and others would need to be scaled down or pared back significantly. The process of identifying these cuts would need to begin immediately, and layoffs, closures, and research pauses or contractions would follow soon thereafter. Cutting back on UNR's research in fields such as artificial intelligence, biomedical engineering, energy and mineral independence, cybersecurity, and environmental sustainability will also have long-term implications on national security and the American economy.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 7, 2025, at Reno, Nevada.

/s/ Adriana Gomez
Adriana Gomez